

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	<b>CASE NO. 25-30155</b>
	§	
<b>ALLIANCE FARM AND RANCH, LLC,</b>	§	<b>(CHAPTER 11)</b>
	§	
<b>DEBTOR</b>	§	
	§	
	§	
<b>IN RE:</b>	§	<b>CASE NO. 25-31937</b>
	§	
<b>ALLIANCE ENERGY PARTNERS, LLC,</b>	§	<b>(CHAPTER 11)</b>
	§	
<b>DEBTOR</b>	§	<b>JOINTLY ADMINISTERED</b>

**DEBTOR ALLIANCE FARM AND RANCH, LLC MOTION TO DISMISS CASE**

**NOTICE PURSUANT TO LOCAL RULE 9013-1**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Alliance Farm and Ranch, LLC (“AFR”) hereby files this Motion to Dismiss Case and respectfully states the following:

1. AFR no longer wishes to prosecute this case. AFR’s representative has instructed the undersigned counsel to request that this Court dismiss the AFR case. The declaration of the representative of AFR stating his reasons for dismissal is attached hereto as Exhibit “A”.

**WHEREFORE**, AFR prays that this Court enter an order dismissing the AFR bankruptcy case; and that it be granted such other and further relief as the Court deems just and proper.

**OKIN ADAMS BARTLETT CURRY LLP**

By: /s/ Timothy L. Wentworth

Timothy L. Wentworth

Texas Bar No. 21179000

1113 Vine St., Suite 240

Houston, Texas 77002

Tel: 713.228.4100

Fax: 346.247.7158

**PROPOSED COUNSEL FOR ALLIANCE  
FARM AND RANCH, LLC AND ALLIANCE  
ENERGY PARTNERS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2025, a true and correct copy of the foregoing Motion was served via the Court's CM/ECF system and by United States First Class Mail to the parties listed on the attached service list.

By: /s/ Timothy L. Wentworth  
Timothy L. Wentworth

Label Matrix for local noticing  
0541-4  
Case 25-30155  
Southern District of Texas  
Houston  
Wed May 21 14:07:59 CDT 2025

ALLIANCE FARM AND RANCH, LLC  
5450 Honea Egypt Rd  
Montgomery, TX 77316-2364

Alliance Energy Partners, LLC  
20008 Champions Forest Dr.  
Suite 1203  
Spring, TX 77379-8697

(p)KEAN MILLER LLP  
ATTN ATTN LLOYD A LIM AND RACHEL K THOMPSON KUBAND  
711 LOUISIANA STREET  
SUITE 1800 SOUTH TOWER  
HOUSTON TX 77002-2716

4  
United States Bankruptcy Court  
PO Box 61010  
Houston, TX 77208-1010

Alliance Energy Partners, LLC  
5450 Honea Egypt Rd  
Montgomery, TX 77316-2364

Alliance Energy Resources LLC  
c/o Idomeia Gibson  
2700 Industrial Ln  
Conroe, TX 77301-4072

Amerisource Funding, Inc.  
P.O. Box 4738  
Houston TX 77210-4738

Dustin Etter  
c/o Noah E. W. Meek  
Irelan McDaniel, PLLC  
2520 Caroline, 2nd Floor  
Houston, TX 77004-1000

Erik and Darla Ostrander  
20105 Krahn Rd.  
Spring, TX 77388-4012

Reagan H. 'Tres' Gibbs, III  
Cokinos Young  
1221 Lamar, 16th Floor  
Houston, TX 77010-3039

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Ste 3516  
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

DrilTech, LLC  
C/O Rachel Kubanda  
711 Louisiana Street  
Suite 1800  
Houston, TX 77002

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)KLEIN INDEPENDENT SCHOOL DISTRICT

(u)Official Committee of Unsecured Creditors

(d)Alliance Energy Partners, LLC  
20008 Champions Forest Dr., Suite 1203  
Spring, TX 77379-8697

(d)Alliance Farm and Ranch, LLC

(u)Dustin Etter

(u)Erik and Darla Ostrander

5450 Honea Egypt Rd.

Montgomery, TX 77316-2364

End of Label Matrix

Mailable recipients 15

Bypassed recipients 6

Total 21

Label Matrix for local noticing  
0541-4  
Case 25-31937  
Southern District of Texas  
Houston  
Wed May 21 14:08:32 CDT 2025  
4  
United States Bankruptcy Court  
PO Box 61010  
Houston, TX 77208-1010

Alliance Energy Partners, LLC  
20008 Champions Forest Dr.  
Suite 1203  
Spring, TX 77379-8697

IAE International, Inc  
co Renshaw PC  
2900 Wesleyan  
Suite 360  
Houston, TX 77027-5132

405 Technology Solutions  
PO Box 8433  
Moore, OK 73153-8433

ADM Machine Shop  
14217 HWY TX-105  
Conroe, TX 77306-5356

AI Driller Inc  
1801 W Wall St  
Midland, TX 79701-6531

ASAP Thread Protectors  
Jose Carrasco  
Houston, TX 77066

Adobe Oilfield Services, Ltd  
705 W. Hillmont  
Odessa, TX 79764-1931

All-American Trucking  
P.O. Box 270568  
Houston, TX 77277-0568

Alliance Drilling Tools, LLC  
PO Box 1503  
Evanston, WY 82931-1503

Alliance Farm and Ranch  
5450 Honea Egypt Rd.  
Montgomery, TX 77316-2364

ArcoTech Drilling Solutions  
REME Technologies dba Arcotech  
PO Box 916  
Broussard, LA 70518-0916

Arrington Directional LLC  
Camp Arrington  
2029 Eagle View Dr.  
Navasota, TX 77868-3951

Bench Tree Rentals, LLC  
2933 E. Davis  
Conroe, TX 77301-7216

Benjamin W. Kadden  
Lugenbuhl, Wheaton, Peck, Rankin  
601 Poydras, Suite 2775  
New Orleans, LA 70130-6041

Big H Transport LLC  
PO Box 215  
Dobbin, TX 77333-0215

Black Diamond  
15425 North Freeway Suite 350  
Houston, TX 77090-6016

Black Diamond Oilfield Rentals, LLC  
15425 North Freeway Suite 350  
Houston, TX 77090-6016

Brent William Smith  
16516 El Camino Real, Suite 406  
Houston, TX 77062-5723

Brittany Lopez CPA PC  
7 Grogans Park, Suite 10  
The Woodlands, TX 77380-2402

Cavare Inc  
Bill Beattie  
12066 FM 3083 Rd  
Conroe, TX 77301-6104

Conroe Welding Supply Inc  
415 South Frazier  
Conroe, TX 77301-5098

DAC Electrical Services, LLC  
7926 Adcock Acres Dr.  
Conroe, TX 77303-4014

DAVM, LLC  
12419 Bagwell Rd  
Willis, TX 77378-4705

DIG  
PO Box 916  
Broussard, LA 70518-0916

Directional Manufacturing and Supply  
1098 Marcon Dr  
Lafayette, LA 70507

Discovery Downhole Services  
1855 Skyview Dr.  
Casper, WY 82601-9641

Downhole Works LLC  
28723 Shirley Court  
Magnolia, TX 77355-5613

Drakewell LLC  
3324 NW 135TH ST  
Oklahoma City, OK 73120-4054

Dril Tech, LLC  
PO Box 622039  
Dallas, TX 75262-2039

Drilling Tools International  
10370 Richmond Avenue, Suite 1000  
Houston, TX 77042-4157

Drilling Tools International  
1514 South County Road 1309  
Midland, TX 79707-5839

Dura Coatings  
13920 South Meridian  
Oklahoma City, OK 73173-8804

Dustin Etter  
c/o Noah E. W. Meek  
Irelan McDaniel, PLLC  
2520 Caroline, 2nd Floor  
Houston, TX 77004-1000

Dyna-Drill  
23400 Colonial Parkway  
Katy, TX 77493-3598

Dyna-Drill Technologies LLC  
23400 Colonial Parkway  
Katy, TX 77493-3598

DynoMax Drilling Tools USA, Inc.  
2830 Farrell Road  
Houston, TX 77073-4106

FT Machine LLC  
820 Turney Dr  
Houston, TX 77038-3922

Ferretville Investments LLC  
20008 Champion Forest Dr., Suite 1204  
Spring, TX 77379-8697

Gator Technologies  
2017 Traders Ridge Drive  
Conroe, TX 77301-2153

GeoGuidance Drilling Services  
P.O. Box 42647  
Bakersfield, CA 93384-2647

Gordon Technologies LLC  
PO Box 1486  
Scott, LA 70583-1486

IAE International, Inc. d/b/a Sniper  
13300 Stonefield Dr.  
Houston, TX 77014-2923

IMECH - Innovative Mech. Solutions, LLC  
2418 Greens Rd  
Houston, TX 77032-1332

InMotion Technical Support  
P.O. Box 770391  
Houston, TX 77215-0391

Innova Drilling and Intervention  
3050 Post Oak Blvd Suite 510  
Houston, TX 77056-6512

J & B Breakout Unit Repairs LLC  
PO Box 604  
Conroe, TX 77305-0604

Justin Renshaw  
2900 Wesleyan, Suite 360  
Houston, TX 77027-5132

Keystone Manufacturing  
12243 Northwoods Park Drive Suite A  
Houston, TX 77041

Kyle V. Littlefield  
32084 Ponderosa Way  
Evergreen, CO 80439-6645

LMJ Solutions Oilfield Services  
2700 Industrial Ln  
Conroe, TX 77301-4072

Lion Inspection Services  
3002 Farrell Rd  
Houston, TX 77073-3007

Lone Star Trucking  
P.O. Box 872  
Odessa, TX 79760-0872

NOS  
2800 Broadway, Suite C-709  
Pearland, TX 77581-9502

On Point Logistics  
15814 Champion Forest Dr. Suite 1083  
Spring, TX 77379-7141

Pegasus NGV Trucking  
PO Box 689  
Broussard, LA 70518-0689

Performance Power Inc.  
P.O. Box 1608  
Casper, WY 82602-1608

Platinum Transport Service  
3526 Azalea Sands Dr.  
Spring, TX 77386-2926

Pmax Energy Services Inc  
16655-2 Telge Road  
Cypress, TX 77429-1387

Rig Runner  
24955 I45 North  
The Woodlands, TX 77380

Schumacher-Dixie, LLC  
5610 Polk Street  
Houston, TX 77023-2106

Spira Systems Inc  
16518 Aldine Westfield Road Suite A  
Houston, TX 77032-1363

Steel River Manufacturing LLC  
18300 Strack Drive Suite 800  
Spring, TX 77379-8798

Surface Resistance Technologies LLC  
2998 Old Highway 105 E  
Conroe, TX 77301-6452

Tellez Machine  
606 Midland Dr  
Houston, TX 77037-1227

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Timothy W. Strickland  
Kean Miller, LLC  
711 Louisiana St., Suite 1800  
Houston, TX 77002-2832

Triumph Express  
5805 Archduke Dr.  
Houston, TX 77032

Truist Bank, Support Services  
P.O. Box 85092  
Richmond, VA 23286-0001

Turnazontal LLC  
8514 Hamer Ranch  
San Antonio, TX 78254-4526

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Ste 3516  
Houston, TX 77002-2604

United Machine Works  
P O Box 525  
New Waverly, TX 77358-0525

United States Trustee's Office  
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Houston, TX 77002-2604

Viking Power Technologies  
5203 Aeropark Dr.  
Houston, TX 77032-4039

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16623 Aldine Westfield Rd.  
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Houston, TX 77018-5338

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Houston, TX 77002-1044

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United States Trustee's Office515 R  
405 Technology SolutionsPO Box 8433M  
ADM Machine Shop14217 HWY TX-105Conr  
Adobe Oilfield Services, Ltd705 W. Hill  
AI Driller Inc1801 W Wall StMidland

(d)Alliance Farm and Ranch, LLC  
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United States Trustee's Office515 R  
405 Technology SolutionsPO Box 8433M  
ADM Machine Shop14217 HWY TX-105Conr  
Adobe Oilfield Services, Ltd705 W. Hill

(d)Workrise- Rusco Operating, LLC  
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End of Label Matrix	
Mailable recipients	80
Bypassed recipients	6
Total	86